

CONTI GROUP COMPANIES, INC.

POULTRY DIVISION
340 JESSE JEWEL PARKWAY - SUITE 200
GAINESVILLE, GEORGIA 30501
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9771 '00 FEB 16 A9:55

February 9, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket Number 98D-0969

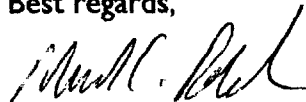
Dear Sir/madam:

Wayne Farms, a Division of ContiGroup Companies Inc., and the sixth largest U.S. producer of broiler meat, appreciates the opportunity to offer these comments concerning the Center for Veterinarian Medicine's draft risk assessment model "Risk Assessment on the Human Health Impact of Fluoroquinolone Resistant Campylobacter Associated with the Consumption of Chicken."

Wayne Farms is dedicated to providing a healthy, safe and affordable protein foodstuff to our worldwide customers. We believe that the world's requirements for chicken meat are great and are increasing due to population growth, increased acceptance of the meat and per capita consumption. An important tool for meeting these goals is the therapeutic use of the fluoroquinolone antibiotics. When all factors are examined, including the NCC response attached here, we believe that the judicious use of these antibiotics can result in a safer food supply, not a more dangerous one, depending on data evaluation (evidence Bayer vs CDC analysis of same data).

We encourage ongoing monitoring and discussions between the federal agencies, poultry producing companies, antibiotic manufacturers, professional/technical organizations and a forum for evaluating the current status, and are willing to be a part of such discussions. We suggest that it is premature and injudicious to consider removal and/or restriction of the fluoroquinolones at this time. We anticipate that good science will be the factor that determines future application of these products. If so, all parties can consider that they have been an important part of feeding the world.

Best regards,



Michael C. Robach
VP Technical Services
and Regulatory Affairs

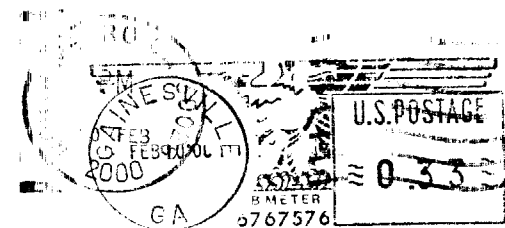


Don Waldrip, D.V.M., A.C.P.V.
Dir. of Health Services & Area
Live Production Mgr.

98D-0969

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